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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BRIAN BORENSTEIN, an individual,

Plaintiff,

vs.

THE ANIMAL FOUNDATION, a domestic
nonprofit corporation; COUNTY OF CLARK,
a political subdivision of the State of Nevada;
SUNRISE HOSPITAL AND MEDICAL
CENTER, LLC, a foreign limited-liability
company domiciled in Delaware; CARLY
SCHOLTEN, an individual; VICTOR
ZAVALA, an individual; and ROE BUSINESS
ENTITIES 1-5; and DOE INDIVIDUALS 1-5,

Defendants,

CASE No.: 2:19-CV-00985-CDS-NJK

**STIPULATION AND ORDER FOR
DEFENDANTS' COUNTY OF CLARK
AND VICTOR ZAVALA TO REPLY TO
[ECF NO. 378] PLAINTIFF'S OPPOSITION
TO MOTION TO DISMISS THIRD
AMENDED COMPLAINT**

[FIRST REQUEST]

Defendants, COUNTY OF CLARK ("Clark County") and VICTOR ZAVALA ("Zavala"), by and through their counsel of record, Jonathan D. Blum, Esq., of the law firm Wiley Petersen and Plaintiff, BRIAN BORENSTEIN, by and through his counsel, Raelene K. Palmer, Esq. of The Palmer Law Firm, P.C., Robert S. Melcic, Esq. of The Law Office of Robert S. Melcic, and Richard E. Retamar, Esq. of Retamar & Millian, P.A., hereby stipulate and request the Court to extend the deadlines for Defendants Clark County and Zavala to reply to [ECF No. 378] *Plaintiff's Opposition to [ECF No. 342], Motion to Dismiss Third Amended Complaint by Defendants County of Clark and Victor Zavala* (the "Opposition") from **Thursday, October 12, 2023 to Friday, October 20, 2023.**

This is the first request for an extension. The parties submit that this request is made in good faith and not for the purpose of undue delay. The Opposition is lengthy and raises numerous issues of

fact and law, making six days to properly respond difficult. Additionally, counsel for Defendants Clark County and Lt. Zavala have several depositions, deadlines, and other time-sensitive work obligations from October 9 through October 12, necessitating an additional eight days to properly reply.

DATED this 6 day of October, 2023.

THE PALMER LAW FIRM, P.C.

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Attorneys for Plaintiff,

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DATED this 6 day of October, 2023.

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ORDER

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: October 10, 2023